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December 30, 2024

VIA ELECTRONIC CASE FILING

The Honorable Judge Julien X. Neals
United States District Judge
Martin Luther King Building & U.S. Courthouse
50 Walnut Street #4015
Newark, New Jersey 07102

**Re: The Roman Catholic Diocese of Paterson, New Jersey, et al. v. United States
Department of State, et al., Case 2:24-cv-08350-JXN-MAH**

Dear Judge Neals:

This Firm acts as Counsel for Plaintiffs, the Roman Catholic Diocese of Paterson, New Jersey, Father Manuel Alejandro Cuellar Ceballos, Father Regin Nico Dela Cruz Quintos, Father Joemin Kharlo Chong Parinas, Father Armando Diaz Vizcara Jr., and Father Joseph Anthony Aguila Mactal ("Plaintiffs").

On November 11, 2024, Plaintiffs filed with the Court a Motion to Stay All Proceedings Through and Including December 31, 2024 (the "Motion"). ECF No. 18. Defendants, United States Department of State, United States Department of Homeland Security, United States Citizenship and Immigration Services, Antony Blinken, in his official capacity as Secretary of the United States Department of State, Alejandro Mayorkas, in his official capacity as Secretary of the United States Department of Homeland Security, and Ur Mendoza Jaddou, in her official capacity as Director of United States Citizenship and Immigration Services ("Defendants"), did not oppose the Motion. *Id.*

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On December 12, 2024, the Court granted the Motion and ordered a stay of all proceedings up to and including December 31, 2024. ECF No. 19. The Court further ordered the filing of a status report no later than December 16, 2024. Id.

The Status Report was filed, and, on December 18, 2024, the Court ordered the filing of a second status report no later than December 30, 2024. ECF. Nos. 22, 23. Plaintiffs, after consultation with Counsel for Defendants, now submit this second letter Status Report.

Plaintiffs, through Counsel and others, continue to work towards a compromise with members of several federal departments and agencies that would, if agreed upon, deem Plaintiffs' Complaint moot. As of today, however, there is not yet an agreement. Nonetheless, Plaintiffs submit that negotiations are ongoing and anticipate that an agreement, if any, will occur no later than March 31, 2025.

As a result, Plaintiffs, without opposition from Defendants, will seek an extension through March 31, 2025, of the current stay of all proceedings that is now set to expire on December 31, 2024. See ECF No. 23.

Unless the Court otherwise orders, Plaintiffs will file a third status report on February 1, 2025. Should a resolution rendering Plaintiffs' Complaint moot occur prior to February 1, 2025, Plaintiffs will so inform the Court.

Should you have any questions, please do contact either of the undersigned. Thank you for your consideration.

Very Truly Yours,

NORRIS McLAUGHLIN, P.A.

/s/ Robert Mahoney

Robert Mahoney, Esq.

/s/ Raymond G. Lahoud

Raymond G. Lahoud, Esq.*

*Pro Hac Vice

RM/RGL:rc

cc: Counsel of Defendants (via ECF)